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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF JESSICA LIOU IN
SUPPORT OF *EX PARTE* MOTION OF
DEBTORS PURSUANT TO B.L.R. 9006-1
REQUESTING ORDER SHORTENING TIME
FOR HEARING ON TORT CLAIMANTS RSA
MOTION**

Related Document: Dkt. 5038

[No hearing requested]

1 I, Jessica Liou, do hereby declare under penalty of perjury that the following is true and
2 correct to the best of my knowledge, information, and belief:

3 1. I am a partner at Weil, Gotshal & Manges LLP, attorneys for PG&E Corporation and
4 Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, “PG&E” or
5 the “Debtors”).

6 2. I submit this declaration in support of the Motion of the Debtors (the “**Motion to**
7 **Shorten**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy
8 Court for the Northern District of California, for entry of an order shortening time for a hearing on
9 December 17, 2019, at 10:00 a.m. (prevailing Pacific Time), on the *Debtors’ Motion Pursuant to 11*
10 *U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order*
11 *(I) Authorizing the Debtors and TCC to Enter Into Restructuring Support Agreement With the TCC,*
12 *Consenting Fire Claimant Professionals, and Shareholder Proponents and (II) Granting Related*
13 *Relief* (the “**Tort Claimants RSA Motion**”), filed contemporaneously herewith.¹ The Debtors
14 request that any responses or objections be in writing and filed with the Court and served by
15 4:00 p.m. (prevailing Pacific Time) on December 13, 2019.

16 3. The December 17, 2019 Omnibus Hearing was already scheduled on the Court’s
17 calendar in these Chapter 11 Cases, with several other motions set for hearing.

18 4. On December 9, 2019, I reached out to the U.S. Trustee, the TCC and the Creditors
19 Committee to seek their respective consent to hearing the Tort Claimants RSA Motion on shortened
20 notice. The TCC consented. As of the filing of the Motion to Shorten, the U.S. Trustee and the
21 Creditors Committee have not yet provided their consent.

22 5. Given the exigencies and the sensitivities concerning the relief requested in the Tort
23 Claimants RSA Motion, it was not feasible to seek consent from other parties prior to the filing of
24 the Motion to Shorten. However, cause exists to hear the Tort Claimants RSA Motion on shortened
25 time, as described in the Motion to Shorten.

26
27 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Tort
28 Claimants RSA Motion or the Motion to Shorten, as applicable.

6. As described in the Motion to Shorten and the Tort Claimants RSA Motion, the Tort Claimants RSA reflects a substantial compromise of the asserted Fire Victim Claims. The Tort Claimants RSA fairly resolves the largest remaining category of disputed claims asserted against the Debtors and will expedite the successful resolution of these Chapter 11 Cases by dispensing with the pending estimation proceedings and Tubbs trial and will pave the way toward confirmation of the Amended Plan well within the June 30, 2020 deadline established under AB 1054.

7. Time is of the absolute essence. As an initial matter, because of the pending Tubbs trial and estimation proceedings, if the Tort Claimants RSA is not approved by this Court by December 20, 2019, it automatically terminates. The Tubbs trial is scheduled to begin with jury selection on January 7, 2020, with the estimation proceedings to commence before the District Court shortly thereafter on February 18, 2020. The parties are devoting massive amounts of time and resources in anticipation of moving ahead with those proceedings in accordance with the compressed schedules previously established. Consideration of the Tort Claimants RSA on shortened notice is essential for the parties to know whether the estimation proceedings and the Tubbs trial will be proceeding as scheduled or will be resolved as provided in the Tort Claimants RSA. Pursuant to the Tort Claimants RSA, the estimation proceedings have been temporarily stayed by the District Court and the parties have agreed to seek a 15-day continuance of the Tubbs trial and are scheduled to appear before the Superior Court of the State of California tomorrow morning. Whether the estimation proceedings or Tubbs trial will recommence depends on the outcome of the hearing on the Tort Claimants RSA Motion, and accordingly, the parties need to know promptly whether those proceedings will move forward or not.

I declare under penalty of perjury that, after reasonable inquiry, the foregoing is true and correct to the best of my knowledge, information, and belief, and this declaration was executed at Jackson Heights, NY, on December 9, 2019.

/s/ Jessica Liou
 Jessica Liou